

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

William Kansky, Treasurer ITT Industries PAC A/K/A (ITTPAC) 4 West Red Oak Lane White Plains, NY 10604

MAR 1 5 2002

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Identification Number:

C00141002

Reference:

Mid-Year Report (1/1/01-6/30/01)

Dear Mr. Kansky:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(i) discloses contributions received through a payroll deduction plan. Generally, a committee's report must identify each contribution from an individual which in the aggregate exceeds \$200 during the calendar year. (2 U.S.C. §434(b)) For your information, instead of separate itemization, a committee using a payroll deduction plan may disclose the aggregate amount of contributions received from the contributor through the payroll deduction plan during the reporting period; the identification of the individual where the contribution exceeds \$200 in the aggregate during the calendar year, and a statement of the amount deducted per pay period. Please refer to the enclosed sample of properly reported payroll deductions. 11 CFR §104.8(b)

Any amendment or clarification should be filed with the Federal Election Commission. Electronic filers must file amendments (to include statements, designations, and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Colleen Manning

Reports Analyst

Sincerely,

Reports Analysis Division

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toolbar and select "memo text."

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Payroli Deductions

Once an individual's deductions aggregate over \$200 in a caleridar year, report the total amount deducted from the denor's psychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, type "payroll deduction" under "Date." The other hamized information, including the year-to-date total, must be completed for each denor. 104.8(b).

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EXAMPLE: During an election year, a corporate manager suthorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter contributions (\$90 for eix pay periods) as "uniternized contributions" on Line 11(e)(ii) in the April quarterly report.

By June 30 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 itemization tiveshold. The manager's second-quarter contributions again are included in "unitariazed contributions" in the July report.

By September 30 (the closing data for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate space. (See item A in the libustration above.)